



## MEMO ENDORSED

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

September 19, 2022

By ECF

The Honorable Kenneth M. Karas  
United States District Judge  
United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Re: *United States of America v. Phillip Liu, et al.*, No. 22 Civ. 5776 (KMK)

Dear Judge Karas:

This Office represents plaintiff the United States of America (the "Government") in the above-referenced matter, which seeks to reduce to judgement the outstanding federal unpaid tax liability of defendant Phillip Liu and foreclose on an apartment he owns with his wife, defendant Ellen Chan-Liu. I write respectfully on behalf of all parties to request a 30-day adjournment of the initial conference, which is currently scheduled for Wednesday, September 21, 2022. See Dkt. No. 21.

The parties believe they may be able to resolve this matter without litigation in the near future and request additional time to explore that possibility before setting a schedule for any discovery and dispositive motions. This is a new development, and we apologize that the timing did not permit the parties to request the adjournment of the initial conference at least five business days prior to the scheduled appearance, pursuant to Section I.C. of Your Honor's Individual Rules of Practice. This is the parties' first request for an adjournment of the initial conference.

We thank the Court for its consideration of this request.

~~Granted~~ Granted. The next conference  
will be 10/18/22, at 12:00.

Sd/ On behalf of  
AK MK  
9/20/22

Respectfully,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/ Mollie Kornreich  
MOLLIE KORNREICH  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
Telephone: 212-637-3274  
E-mail: mollie.kornreich@usdoj.gov

cc: Counsel of Record (by ECF)